## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

O 5 CR 1 0 2 2 4 GAO

Criminal No.

V.

21 U.S.C. § 846-
Conspiracy to

Distribute Cocaine Base

21 U.S.C. § 841(a) (1) -
Distribution of

Cocaine Base

Cocaine Base

21 U.S.C. § 853-
Criminal Forfeiture

#### INDICTMENT

COUNT ONE: (21 U.S.C. § 846 -- Conspiracy To Distribute Cocaine Base)

The Grand Jury charges that:

From a time unknown to the Grand Jury, but at least from March 30, 2005, and continuing thereafter until at least April 8, 2005, at Brockton, in the District of Massachusetts, and elsewhere,

J.C. ANDERSON,
a/k/a "Mann",

defendant herein, did knowingly and intentionally conspire, confederate, and agree with persons known and unknown to the Grand Jury, to possess with intent to distribute, and to distribute, quantities of cocaine base, also known as "crack

cocaine", in violation of Title 21, United States Code, Section 841(a)(1).

The Grand Jury further charges that the conspiracy described herein involved at least 50 grams of a mixture or a substance containing a detectable amount of cocaine base, also known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(A)(iii).

All in violation of Title 21, United States Code, Section 846.

# COUNT TWO: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base)

The Grand Jury further charges that:

On or about March 30, 2005, at Brockton, in the District of Massachusetts,

# J.C. ANDERSON, a/k/a "Mann",

defendant herein, did knowingly and intentionally possess with intent to distribute, and distribute, a quantity of cocaine base, also known as "crack cocaine," a Schedule II controlled substance.

The Grand Jury further charges that the transaction described herein involved at least 5 grams of a mixture or a substance containing a detectable amount of cocaine base, also known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B)(iii).

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base)

The Grand Jury further charges that:

On or about April 8, 2005, at Brockton, in the District of Massachusetts,

J.C. ANDERSON,
a/k/a "Mann",

defendant herein, did knowingly and intentionally possess with intent to distribute, and distribute, a quantity of cocaine base, also known as "crack cocaine," a Schedule II controlled substance.

The Grand Jury further charges that the transaction described herein involved at least 5 grams of a mixture or a substance containing a detectable amount of cocaine base, also known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B)(iii).

All in violation of Title 21, United States Code, Section 841(a)(1).

### FORFEITURE ALLEGATION (21 U.S.C. § 853)

The Grand Jury further charges that:

1. As a result of the offenses alleged in Counts One through Three of this Indictment,

### J.C. ANDERSON, a/k/a "Mann",

defendant herein, shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of such offenses; and/or shall forfeit to the United States any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including, but not limited to, the following:

- (a) One Gray 2003 Honda Pilot, VIN# 2HKYF187X3H562424, Massachusetts license plate CI947J, registered in the name of JC Jones Anderson.
- 2. If any of the properties described in paragraph 1, above, as a result of any act or omission of the defendant --
  - (a) cannot be located upon the exercise of due diligence;
  - (b) has been transferred or sold to, or deposited with, a third party;
  - (c) has been placed beyond the jurisdiction of the Court;
  - (d) has been substantially diminished in value; or
  - (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 1.

All in violation of Title 21, United States Code, Section 853.

#### A TRUE BILL

Foreperson of the Grand Jury

Cynthia W. Lie

Assistant United States Attorney

DISTRICT OF MASSACHUSETTS:

August <u>J</u>, 2005

Returned into the District Court by the Grand Jurors and filed.

Thomas to Crus

Deputy Clerk 8/34/65

C 2:55 pm

Case 1.05-cr-10224-GAO Document 1-2 Filed 08/24/2005 Page 1 of 2 Criminal Case Cover Sheet U.S. District Court - District of Massachusetts Place of Offense: Brockton Category No. II Investigating Agency ATF Related Case Information: City Boston Superseding Ind./ Inf. Case No. Suffolk County New Defendant Same Defendant Magistrate Judge Case Number Search Warrant Case Number R 20/R 40 from District of **Defendant Information:** Yes X No Juvenile Defendant Name J.C. Anderson Alias Name Mann Address 36 Cushing Ave. Brockton, MA Birth date (Year only): 75 SSN (last 4 #): 3030 Sex M Race: \_\_\_\_\_\_Nationality: \_\_\_\_\_ Defense Counsel if known: Address: Bar Number: U.S. Attorney Information: AUSA Cynthia Lie Bar Number if applicable Yes No Interpreter: List language and/or dialect: x Yes Matter to be SEALED: X Warrant Requested Regular Process In Custody **Location Status:** Arrest Date: Already in Federal Custody as Already in State Custody \_\_\_\_\_ Serving Sentence Awaiting Trial Ordered by On Pretrial Release: Information X Indictment Charging Document: Complaint Petty \_\_\_\_\_ Misdemeanor \_\_\_\_ X Felony 3 Total # of Counts: Continue on Page 2 for Entry of U.S.C. Citations I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above. Signature of AUSA: Date:

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District Court Case Number (To b		
Name of Defendant J.C. AND	ERSON	-
	U.S.C. Citations	
Index Key/Code	Description of Offense Charged	<b>Count Numbers</b>
Set 1 21 USC 846	Conspiracy to distribute cocaine base	1
Set 2 21 USC 841	Distribution of Cocaine Base	2
Set 3 21 USC 841	Distribution of Cocaine Base	3
Set 4		
Set 5		·
Set 6		
Set 7		
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Set 11		
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Set 15		

ADDITIONAL INFORMATION: